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CLERK, U.S. DISTRICT COURT

1/22/25

CENTRAL DISTRICT OF CALIFORNIA

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5 UNITED STATES DISTRICT COURT  
6 CENTRAL DISTRICT OF CALIFORNIA

7 2:25-cv-00595-RGK(MAAx)

8 Kimberly Clisbee and Christopher Co

9 } Complaint: Civil action for damages

10 Kathryn Bader, Gavin Newsom, Rob

11 } Cause of action: Fraud, Negligence, conspiracy  
Bonta, Stephen Morgan, State of California,  
12 } against rights, the color of the law crimes,  
County of Los Angeles, Department of Health  
13 } personal injury, other civil rights violations

14 and Human Services, LA County Department of

15 Public Health – Children's Medical Services,  
16 Department of Developmental Services, DOJ,  
17 Edward Bloch, Mark Krieger, James Lee, Leigh  
18 Ramos Platt, Racheal Thompson, Joyce Wu,  
19 } In accordance with the Federal Tort Act, False  
Anat Erdreich-Epstein, Arie Fallah, Children's  
20 Hospital Los Angeles, UC Regents, City of  
21 Palmdale, City of Los Angeles, Palmdale School  
22 District, Raul Maldonado, Donna Campbell,  
23 Aaron Yoscovitz, AV SELPA, El Dorado  
24 SELPA, North Los Angeles County Regional  
25 Center, LAPD, LASD, OIG  
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Original filing date: 1/22/2025

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1 INTRODUCTION  
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3 I reserve the right to withhold the details of this complaint until the trial begins due to numerous acts  
4 of judiciary misconduct and fraud that have blocked my access to a jury, which is required by the 7th  
5 Amendment and Rule 38 of Federal proceedings. This misconduct has gone on for several years, and the  
6 defense's retaliation has injured my family and me. It is forcing us to live under color-of-the-law crimes  
7 and reducing, withholding, and controlling fundamental rights to prevent access to justice.  
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9           **Hobbs Act** (18 U.S.C. § 1951): Interfering with commerce by threats or violence, including  
10 attempts to influence a federal trial through fraud or intimidation, is a crime.  
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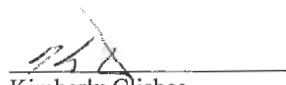
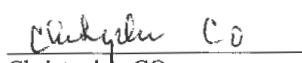
12           This crime is ongoing, and the defendants are aware of why we are taking them to court. We  
13 will not let them use the contents of the complaint to stall or prevent access to our 7th and 14th  
14 Amendment rights as they have for three years.  
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16           I will state the statute of limitations was reset to August 30<sup>th</sup>, 2024, resulting from a medical  
17 board review that determined no malpractice was committed in either victim because no surgery was  
18 ever needed, and no illness existed. “Surgery due to race or some fraudulent purpose is not a medical  
19 condition. It requires law enforcement intervention.”  
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21           Also, three investigations, one by the County Department of Public Social Services director,  
22 one by the State Department of Developmental Services Ombudsman, and one by the La County  
23 Office of Civil Rights, took place between April 2024 and July 2024 and confirmed that our injuries  
24 were a result of the crime. They required intervention by Rob Bonta, the DOJ, and Kathryn Barger,  
25

1 all participants in the fraud, and all refused to assist. They even permitted color-of-law crimes,  
2 including death threats and judiciary misconduct, to prevent access to a jury demand. There are over  
3 sixty-eight witnesses, three victims, and dozens of crimes of various types and degrees over fifteen  
4 years, including officials and doctors, and a jury is legally the only appropriate method of resolution  
5 according to Rule 38 of Federal Proceeding.  
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10 I declare under penalty of perjury under the laws of the State of California that the foregoing is true  
11 and correct and that this declaration was executed on January 22, 2025, in Palmdale, California.

12  
13 Date: 1/22/2025   
14 Kimberly Clisbee  
15 Date: 1/22/2025   
16 Christopher CO  
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## **PRAAYER FOR RELIEF**

WHEREFORE, Plaintiffs pray for judgment against Defendants as follows:

1. The plaintiffs will receive one hundred fifty million dollars in financial damages in the settlement, including triple damages fraud.
2. Punitive actions the jury sees fitting.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this declaration was executed on January 22, 2025, in Palmdale, California.

Christopher Co

Christopher Co

Kimberly Clisbee

## **Proof Of Service**

I, the undersigned, declare I am a resident of Los Angeles, State of California, acting as pro per I am over the age of eighteen (18) years and not a party to the action; my business the address is 3531 Springridge Way, Palmdale, California, 93551

On January 21st, 2025, I served the within:

## Complaint

D By sending a true copy thereof electronically to the individual(s) and electronic service address(s) as set forth below from the electronic service address:

~ By placing a time copy thereof enclosed in a sealed envelope with a prepaid postage thereon fully prepaid for deposit in the United States Post Office mailbox, following my ordinary business practices for collecting and processing correspondence for mailing of which I am readily familiar with the individual(s) and address(s) as set forth below.

D By depositing a true copy thereof enclosed in a sealed envelope with delivery fees thereon fully prepaid in a box or other facility regularly maintained by the Federal Express for overnight mail for collection to the individual(s) and address(s) as set forth below.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that these declarations were executed on January 21, 2025, in Palmdale, California.

Date: 1/22/2025

Kimberly Clisbee

Kimberly Lissel 10/2

Date: 1/22/2025

Christopher CO

Christopher Co - 6 - Christopher Co